

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 2 and 90 of the)	
Commission's Rules to provide for an)	
Emergency Vehicle Signaling Service)	RM-10836

**REPLY COMMENTS OF THE ASSOCIATION OF
FEDERAL COMMUNICATIONS CONSULTING ENGINEERS
ON FCC PUBLIC NOTICE**

1. The Association of Federal Communications Consulting Engineers (AFCCE), an organization which is over fifty years old, includes approximately 85 full members who are Registered Professional Engineers engaged in the practice of consulting engineering before the Federal Communications Commission.

2. The Commission released a Public Notice seeking comment on Alert Devices International Corporation ("ADiCorp") Petition for Rulemaking on Emergency Vehicle Signaling Service.¹ ADiCorp is proposing an Emergency Vehicle Signaling Service ("EVSS"). The purpose of EVSS is to alert motorists, who are tuned to a AM or FM station, that a public safety vehicle is engaged in a nearby emergency response situation. AFCCE has reviewed the comments submitted in this proceeding and offer the following reply comments.

3. Comments of Leventhal Senter & Lerman PLLC. The Leventhal Senter & Lerman PLLC comments (herein "LSL"), which included an Engineering Statement prepared by AFCCE member firm Cavell, Mertz & Davis, Inc, does not support the proposed EVSS service. From a technical perspective, LSL comments that EVSS "...would be unable to deliver on its promised service due to inherent technical limitations affecting the range of EVSS transmissions and the service's inability to co-exist with AM and FM stations." Notably, the LSL comments point out that the range of

¹ Public Notice, Comment Sought on ADiCorp's Petition for Rulemaking on Emergency Vehicle Signaling Service, Comments Due February 12, 2004. Reply Comments Due March 31, 2004 (reply comment deadline extended at request of Petitioner)

service from EVSS would not be consistent, since the range of its service is dependent upon the field strength of the full-service station (i.e. the stronger the main FM station being overridden, the smaller the EVSS coverage area). The calculated service radius distances for EVSS could range as small as 5 feet to as great as 1,558 feet. This inconsistent range of service from EVSS could actually confuse the radio listener, as the listener may not be likely to determine how far away the emergency vehicle is located.


4. Furthermore, the LSL comments that unintended reception is possible. For example, people listening to the radio while working or living near hospitals, where larger numbers of EVSS equipped vehicles may passing throughout a day, may suffer from unintended reception EVSS transmissions.

5. Comments of Society of Broadcast Engineers, Inc. The Society of Broadcast Engineers, Inc comments (herein "SBE") also does not support the proposed EVSS service. SBE points out that the proposed EVSS protection of primary EAS station is not sufficient. It is noted that generated EAS local and weather messages are "generally NOT delivered by just one particular broadcast station in a given area." Therefore, it is possible for unique EAS messages to be overridden by EVSS on non-primary EAS stations.

6. Comments of National Association of Broadcasters. The National Association of Broadcasters (NAB) also comments on several technical issues with EVSS including the unknown impact of EVSS on the emerging service of In-Band/On Channel ("IBOC"), otherwise known as HD Radio. Also, the effect of the proposed frequency offset on the EVSS FM transmission is not sufficiently explained.

7. AFCCE recommends that the Commission carefully review the aforementioned comments on their technical merits. These technical issues raise doubt that the proposed EVSS system would be in the public interest.

Respectfully Submitted,

/s/ 
Thomas B. Silliman, P.E.
President
March 30, 2004